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July 16, 2015

VIA ECF AND HAND DELIVERY

Re: *Laydon v. Mizuho Bank, Ltd. et al.*,
No. 12-cv-3419 (GBD) (HBP)
Letter from the European Commission

The Honorable Henry B. Pitman, U.S.M.J.
United States District Court
for the Southern District of New York
500 Pearl Street
New York, New York 10007

Dear Judge Pitman:

We are counsel to Defendant JPMorgan Chase & Co. On October 10, 2014, we provided the Court with a copy of an October 8, 2014 letter received by JPMorgan from the European Commission (the “EC”) regarding Plaintiff’s First Request for Production of Documents (the “Letter”). See Dkt. No. 396. In the Letter, the EC stated, among other things, that “the disclosure of any of the requested documents would be made in contravention of Commission rules and stated policy on this issue.” Letter at 1.

Following the conference with Your Honor on June 25, 2015, JPMorgan provided the EC with an update on the status of Plaintiff’s document requests and now understands that the EC does not object to JPMorgan producing pre-existing documents (*i.e.*, the historical documents requested in Plaintiff’s Request No. 3, as distinguished from requests from regulators for information, responses to such requests, documents relating to the settlement process, or other documents generated in connection with the regulatory investigations), to be identified generally as documents that have been provided to regulators, but not specifying which documents were provided to which regulators (nor will there be any identifying information on the copies produced to Plaintiff that would allow such identification to be made).

Given that Plaintiff is not now pursuing any documents sought in the First Request for Production other than such pre-existing documents, JPMorgan has not sought, nor has the EC provided, any further information concerning the EC’s position on Plaintiff’s other

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requests. The EC did ask that it continue to be kept informed of any further relevant developments.

Please let us know if the Court has any questions concerning these matters.

Respectfully,



Paul C. Gluckow

cc: Counsel of Record (by ECF)